

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRAVELERS INDEMNITY COMPANY,
TRAVELERS INDEMNITY COMPANY OF
CONNECTICUT, formerly known as
TRAVELERS INDEMNITY COMPANY OF
RHODE ISLAND, TRAVELERS CASUALTY AND
SURETY COMPANY, formerly known as
THE AETNA CASUALTY AND SURETY
COMPANY, AND TRAVELERS PROPERTY
CASUALTY COMPANY OF AMERICA,
formerly known as TRAVELERS INDEMNITY
COMPANY OF ILLINOIS,

Plaintiffs,

v.

NORTHROP GRUMMAN CORPORATION,
NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants,

and

CENTURY INDEMNITY COMPANY, eventual
successor in interest to INSURANCE COMPANY
OF NORTH AMERICA,

Nominal Defendant.

12-CV-03040 (KBF)(FM)

**DECLARATION OF
MICHELE G. PIERRO**

ECF CASE

I, Michele G. Pierro, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a professional historical researcher and insurance archaeologist employed as the Executive Vice President of the Insurance Archaeology Group (“IAG”). The business of IAG consists of recovering lost insurance assets that protect against current liabilities and performing historic audits that reconstruct a company’s insurance history. In reconstructing a coverage history, IAG conducts research of internal and external sources. IAG provides services

to all industry sectors from the Fortune 500 to small to midsize companies as well as government agencies and municipalities. I have been employed as an insurance archaeologist since May 1986.

2. Attached to this declaration as Exhibits A to F are copies of an insurance certificate and U.S. Navy correspondence obtained by IAG from the U.S. Navy's historic files located in The Washington National Records Center in Suitland, MD (the "WNRC").

3. As a professional insurance archaeologist I regularly obtain historical records concerning insurance coverage purchased by commercial policyholders. One important source of such historical records, particularly for commercial policyholders that did business with the U.S. government, is the WNRC. I have supervised IAG's searches of records stored in the WNRC on numerous occasions over the past approximately 25 years. Through this experience, I have become knowledgeable about the identity of what insurance-related records are maintained in the WNRC and the appearance of those records.

4. Based on my knowledge and experience reviewing records stored in the WNRC, I can confirm that: (a) the attached insurance certificate and U.S. Navy correspondence were maintained by the U.S. Navy in the WNRC; and (b) the attached insurance certificate and U.S. Navy correspondence appear to be in their original, official, unaltered and authentic form.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on February 1, 2013, in New York, NY.


Michele G. Pierro